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VIA CM/ECF

The Honorable Judge Allison D. Burroughs
United States District Judge
John Joseph Moakley U.S. Courthouse
1 Courthouse Way
Boston, MA 02210

Re: Picone v. Shire U.S., Inc., No. 16-cv-12396-ADB

Dear Judge Burroughs:

I am counsel to Defendant Actavis Elizabeth LLC ("Actavis") in the above-captioned action, which was filed on November 23, 2016 and is currently pending before this Court. I write to notify the Court of proceedings in several related cases that are likely to affect the proceedings in this case.

First, as the Court is aware, there are two subsequently-filed actions raising related issues which are currently pending before Judge Gorton. See ECF No. 17. Counsel that filed those actions has moved that they be designated as related to the above-captioned action and thus—by operation of the Local Rules—reassigned to Your Honor. See ECF No. 17. Actavis agrees that those cases are related to this one and would appropriately be reassigned to Your Honor as counsel in those cases requested.

In addition, there are two related lawsuits that are very similar to this one, and that were brought by the same national plaintiff's counsel as this one, that are currently pending in the Southern District of Florida and the Eastern District of Wisconsin. See *Richard v. Shire U.S., Inc.*, No. 1:16-cv-24907-JEM (S.D. Fla. filed Nov. 23, 2016); *Cummisford v. Shire U.S., Inc.*, No. 16-cv-1570 (E.D. Wisc. filed Nov. 23, 2016). The parties in those cases have now jointly moved to transfer those cases to this Court under 28 U.S.C. § 1404(a). See Joint Motion to Change Venue, ECF No. 43, *Richard*, No. 1:16-cv-24907 (S.D. Fla. Jan. 18, 2017); Stipulation and Consent of All Parties to Transfer Venue to the District of Massachusetts, ECF No. 16, *Cummisford*, No. 2:16-cv-01570-PP (E.D. Wisc. Jan. 18, 2017). If the parties' joint motions to transfer are granted, it is therefore likely that these additional cases also will be assigned to Your Honor under the Local Rules.

The parties are continuing to discuss how best to coordinate what may soon be five related cases pending before this Court. We look forward to the opportunity to address these issues with the Court at its convenience.

Respectfully submitted,

/s/ Christopher T. Holding

Christopher T. Holding

cc: All Counsel of Record (via CM/ECF)